

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
Jessica Lee Gonzalez,	:	Chapter 13
aka Jessica L. Gonzalez	:	
aka Jessica Gonzalez	:	Case No. 5:22-bk-02200-MJC
aka Jessica Singer	:	
aka Jessica Lee Singer	:	
aka Jessica L. Singer	:	
Debtor	:	
	:	
Jessica Lee Gonzalez	:	
Objector	:	OBJECTION TO
v.	:	PROOF OF CLAIM #1
United Auto Credit Corporation	:	
Claimant	:	

OBJECTION TO CLAIM No. 1 OF
United Auto Credit Corporation

COMES NOW, the Debtor, by and through her attorneys, and in support of the Objection to Claim No. 1 of United Auto Credit Corporation, avers as follows:

1. Debtor filed the instant Chapter 13 bankruptcy on November 14, 2022.
2. On November 28, 2022, Claimant filed Proof of Claim No. 1 (the “Claim”) asserting a secured claim in the amount of \$408,669.61.
3. Claimant attached to the Claim a Complaint filed in the Superior Court of California, Orange County on or about October 3, 2022 (the “California Litigation”).
4. There is no indication in the Claim or attachment that a judgment was ever entered in the California Litigation.
5. Since this appears to be a contingent or unliquidated claim this Court has jurisdiction to estimate the value of this claim pursuant to 11 USC § 502(c) and a request for estimation of this claim is hereby made.

6. In addition, Claimant alleges in the California Litigation that Debtor executed a Personal and Continuing Guarantee agreeing to be personally liable for Car Mart Auto Center's breaches of a Dealer Agreement.

7. Claimant failed, however, to append the Personal and Continuing Guarantee to the Claim to confirm the veracity of this allegation.

8. Debtor disputes this is an individual debt to be paid from her Bankruptcy Estate unless and until the Personal and Continuing Guarantee is produced.

WHEREFORE, the Debtor prays that the Court conduct a hearing to estimate the value of this claim pursuant to 11 USC § 502(c), to determine whether the Debtor is personally liable for the Claim, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.
Robert J. Kidwell, Esq.
Attorney I.D. #206555
Attorney for Debtor